NEVADA DIVISION OF ENVIRONMENTAL PROTECTION
FACT SHEET
(Pursuant to NAC 445A.236)

Permittee: City of Las Vegas
400 Stewart Ave
Las Vegas NV 89101

Permit No.: NV0023035

Facility: Neonopolis
450 Fremont St
Las Vegas, Clark County, Nevada, 89101
Township 20S, Range 61E, Section 34

Latitude: 36° 10' 00" North
Longitude: 115° 08' 30" West

Drinking Water Protection: Neonopolis is within the 6000' but outside the 3000' Drinking Water Protection Area (DWPA) around one public water supply well: Shady Acres Trailer Park, Well 01. A Wellhead Protection Area (WHPA) has not been established for this water system.

Bureau of Corrective Actions Sites: There are 20 sites within 1 mile of the subject facility which are overseen by Nevada Division of Environmental Protection Bureau of Corrective Actions (BCA). The BCA case officers in charge of these sites have indicated that adverse effects of the proposed project on the ongoing corrective activities are not anticipated.

General: The discharge permit for this facility was originally issued in 1999. Neonopolis is a commercial building with a two story underground parking garage, owned by the City of Las Vegas. Drain board on the exterior of the garage walls transports intercepted groundwater to piping that terminates at two sumps on opposite sides of the building. Floor drains in the garage also drain to those sumps. Pumps deliver the groundwater and floor drainage to the storm drain system. The discharge is untreated.

Discharge Flow and Characteristics: During the period from January 2005 through June 2009, the following discharge flow volume and characteristics were reported:

Parameter		Permit Limit	Average	Maximum	Minimum
Flow (gpm):	Outfall 001	***100***	11.48	14.8	0
	Outfall 002	***(Total)***	7.99	11.8	6
Total Inorganic Nitrogen (mg/l):	Outfall 001	***M & R***	1.93	2.25	1.67
	Outfall 002		2.10	2.34	1.77
Total Ammonia (mg/l):	Outfall 001	***M & R***	<0.1	<0.1	<0.1
	Outfall 002		<0.1	<0.1	<0.1
Total Dissolved Solids (mg/l):	Outfall 001	***M & R***	941	1000	835
	Outfall 002		781	852	640
Total Phosphorus (mg/l):	Outfall 001	***M & R***	0.070	0.24	0.02
	Outfall 002		0.061	0.24	<0.015
Total Petroleum Hydrocarbons (mg/l):	Outfall 001	***1.0***	<0.50	4.1	<0.50
	Outfall 002		<0.50	1.7	<0.50

M & R = Monitor and Report

Total Petroleum Hydrocarbons (TPH) were detected in several of the monitoring samples. Implementation of housekeeping controls has minimized introduction of these contaminants to the collection sumps. TPH has not been detected in either Outfall at a reporting limit of 0.50 mg/l since November 2007.

Volatile Organic Compounds (VOCs) were detected three times during the period in question. VOCs in the discharge have not been seen to be persistent or pronounced, and are not indicative of significant groundwater contamination. There are no Division action levels for the detected substances. VOCs have not been detected since December, 2007. Reported VOCs were as follows:

Date	Outfall	Organic Compound	Concentration
October 2006	002	Chloroform	1.2 µg/l
March 2007	002	Chloroform	1.7 µg/l
December 2007	001	Chloroform	2.8 µg/l
		Dibromochloromethane	2.2 µg/l
		Bromoform	6.9 µg/l

Receiving Water Characteristics: The storm drain system in this area is tributary to Las Vegas Wash, and the standards set at the nearest downstream control point, "Las Vegas Wash at Telephone Line Road", apply. From the control point, the TDS standard is 1900 mg/l and the total inorganic nitrogen standard is 20 mg/l. In addition, Total Maximum Daily Loads (TMDLs) for Las Vegas Wash have been established for phosphorus and ammonia.

Proposed Effluent Limitations and Monitoring Requirements: The discharge shall be limited and monitored by the Permittee at the following locations, in accordance with Table I.A.1: Outfall 001 (Sump #1 or North Sump), and Outfall 002 (Sump #2 or South Sump) to the storm drain, which in turn discharges to Las Vegas Wash. Discharge samples taken in compliance with the monitoring requirements specified below shall be taken from each sump's discharge pipe and reported for each Outfall. Flow from each sump shall be measured separately via flow meter, and the combined flow from the two Outfalls shall be limited to 100 gallons per minute (gpm).

Table I.A.1

PARAMETER	DISCHARGE LIMITATION		MONITORING REQUIREMENTS	
	30-Day Average	Daily Maximum	Monitoring Frequency	Sample Type
Flow (gpm): Total Outfall 001 Outfall 002	100 M & R M & R	M & R M & R M & R	Continuous	Flow Meter
Total Petroleum Hydrocarbons [1] (mg/l)	---	1.0	Monthly	Discrete
Total Dissolved Solids (mg/l)	---	M & R	Annually [2]	Discrete
Total Inorganic Nitrogen (mg/l)	---	20	Annually [2]	Discrete
Nitrate + Nitrite as Nitrogen (mg/l)	---	M & R	Annually [2]	Discrete
Ammonia as N Total [3]: (lbs/day) Each Outfall: (mg/l)	 --- ---	 1.0 M & R	Annually [2]	Discrete
Total Phosphorus as P Total [3]: (lbs/day) Each Outfall: (mg/l)	 --- ---	 1.0 M & R	Annually [2]	Discrete
Volatile Organics [4], µg/l	---	M & R	Annually [2]	Discrete

Notes: "M & R" = Monitor and Report

1. EPA Method 8015B and EPA Method 8260 B, full range, C6-C40. Summation must meet permit limit
2. Annual monitoring shall be reported in the fourth quarter Discharge Monitoring Report.
3. Demonstrates deminimus discharge.
4. EPA Method 8260B, report all parameters

Total inorganic nitrogen as N = Ammonia as N + nitrate as N + nitrite as N

Schedule of Compliance: The Permittee shall implement and comply with the provisions of the schedule of compliance after approval by the Administrator, including in said implementation and compliance, any additions or modifications which the Administrator may make in approving the schedule of compliance.

a. The Permittee shall achieve compliance with the effluent limitations upon issuance of the permit.

b. The Permittee shall submit a report in accordance with permit condition I.B.1.c. within 14 days of a compliance date detailing compliance or noncompliance with that date.

c. **By MMM DD, 2010**, the Permittee shall submit for review and approval an Operations and Maintenance (O&M) Manual, compiled in accordance with the appropriate sections of Nevada Division of Environmental Protection (NDEP) guidance document WTS-2, "Minimum Information Required for an Operation and

Maintenance Manual for a Wastewater Treatment Plant". The document shall be submitted to the following address:

Mr. Nadir Sous
Division of Environmental Protection
Bureau of Water Pollution Control - Las Vegas
2030 E. Flamingo Rd
Suite 230
Las Vegas, NV 89119-0837

A copy of the final approved document shall be submitted to the following address:

Department of Conservation and Natural Resources
Division of Environmental Protection
Bureau of Water Pollution Control
ATTN: Compliance Coordinator
901 S. Stewart Street, Suite 4001
Carson City, Nevada 89701

Rational for Permit Requirements:

FLOW (100 gpm): This is based on the capacity of the sump pumps.

TOTAL PETROLEUM HYDROCARBON (1.0 mg/l): The monthly sampling requirement and effluent limit for this parameter have been imposed based on the potential presence in the discharge. The source is most likely drainage from washing the garage floor or other disposal practices.

TOTAL PHOSPHORUS AS PHOSPHORUS AND TOTAL AMMONIA AS N (1.0 lb/day): Total Maximum Daily Loads (TMDLs) of 434 lb/day Total Phosphorus and 970 lb/day Total Ammonia have been established for the Las Vegas Wash. The waste load allocations (WLAs) have been assigned only to the Cities of Las Vegas and Henderson and the Clark County Water Reclamation District.

Based on the State's de minimis policy of exempting discharges of less than 1 lb/day TP from the TMDL analysis, a WLA has not been assigned to this Permittee. At the maximum permitted flow of 100 gpm (0.144 MGD), the groundwater Total Phosphorus and Total Nitrogen concentrations would each have to exceed 0.83 mg/L to violate the 1 lb/day of the de minimis policy.

TOTAL INORGANIC NITROGEN (TIN) (20 mg/l): The permit limits TIN to 20 mg/l, the Las Vegas Wash water quality standard.

The remaining parameters discussed below are subject to "Monitor and Report" requirements instead of discharge limitations.

TOTAL DISSOLVED SOLIDS (TDS): The shallow groundwater with naturally occurring elevated TDS levels would flow to the Wash, if it was not intercepted by the dewatering system, therefore, the TDS standard is not applied to dewatering discharges in this area. The permit requirement is to Monitor and Report.

This permit is for the interception and passage of groundwater and thus is exempted under the Colorado River Basin Salinity Control Forum's policy on groundwater interception.

NITROGEN SPECIES: The permit requires reporting of the remaining Total Inorganic Nitrogen constituent components of nitrite and nitrate.

VOLATILE ORGANIC COMPOUNDS: The permit requires an annual VOC scan so that any plumes that develop or migrate to the site would be detected.

Procedures for Public Comment: Notice of the Division's intent to renew Discharge Permit NV0023035, authorizing a dewatering discharge to the storm drain at Neonopolis, is being sent to the **Las Vegas Review Journal** for publication. The notice is being mailed to interested persons on our mailing list. Anyone wishing to comment on the proposed permit must submit written comments to the Division within (30) days of the publication date. The comment period can be extended at the discretion of the Administrator. The deadline for receipt of all written comments is **5:00 PM, February 1, 2010**. Comments received after the deadline will be accepted if postmarked on that date or before.

A public hearing on the proposed determination can be requested by the applicant, any affected state or interstate agency, the Regional Administrator, or any interested agency, person, or group of persons. The request must be filed within the comment period and indicate the interest of the person filing the request and the reasons why a hearing is warranted. Public hearings granted by the Division are conducted in accordance with NAC 445A.238.

The final determination of the Division may be appealed to the State Environmental Commission pursuant to NRS 445A.605.

Proposed Determination:
The Division has made the tentative determination to renew the proposed discharge permit for a five year term.

Prepared by: Janine O. Hartley
Bureau of Water Pollution Control
November, 2009